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Ms. Felicia Marcus, Chair
c/o Jessica Bean
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95812-2000

RE: Evaluation of Compliance with Mandatory Conservation Standards

Chair Marcus and Members of the Board,

Under the proposed text of emergency regulation (“Article 22.5 Drought Emergency Water Conservation”), covered water suppliers would be assigned to a conservation standard tier based on historical consumption patterns, and evaluated for compliance with their respective mandated reduction on the basis of system production data.

We agree that basing such regulation on system production data is the most comprehensive and effective means of achieving the desired reductions, since it accounts for all volumes of water entering a system, including those volumes that are lost to system leakage. Furthermore, if the Water Board ultimately decides to recommend leak detection and repair as a means of achieving reductions—as the current “Fact Sheet” issued by the Water Board suggests—it is imperative that reductions be based on system production data, as customer sales data will not account for reductions realized through leak detection and repair, which recovers leakage on the upstream side of the customer meter.

However, in our professional experience, **we have become aware of the challenges of receiving accurate system production data, due to the varied levels of accuracy of the water meters that collect such data. Inconsistent levels of meter accuracy—both between meters and also within the same meter over time—pose an obstacle to proper evaluation of compliance with conservation standards.** We write to make the Water Board of aware of such challenges, so that it may develop appropriate regulations and procedures with respect to the quality of production data, and ensure that the implementation of the conservation standards is done so consistently, fairly, and effectively.

Sincerely,

Reinhard Sturm
Chief Operating Officer
Water Systems Optimization, Inc.